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10 Attorneys for Plaintiff,

11 ROY CASTELLANOS

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 In re: SCOOBEEZ, INC, et al;

) Bankruptcy Petition # 2:19-bk-14989-WB

)

) *[Honorable Julia W. Brand]*

)

) **DECLARATION OF SARA Y.**

) **SHOWKATIAN IN SUPPORT OF MOTION**

) **FOR RELIEF FROM BANKRUPTCY**

) **AUTOMATIC STAY**

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21 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:
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DECLARATION OF SARA Y. SHOWKATIAN

I, Sara Y. Showkatian, hereby declare as follows:

1. I am an attorney admitted to practice before the Courts of the State of California, and this Court. I am an associate attorney at the law firm of Levin & Nalbandyan, LLP, attorneys for Roy Anthony Castellanos ("Mr. Castellanos").
2. Our firm represents Mr. Castellanos in his potential wrongful termination claims against Debtor Scoobeez, Inc. ("Debtor"), In re: SCOOBEEZ, INC., et al.; Bankruptcy Petition # 2:19-bk-14989-WB.
3. Mr. Castellanos is informed and believes his potential wrongful termination claims arise under nonbankruptcy law and can be most expeditiously resolved in the nonbankruptcy forum.
4. As of the filing on this motion, the nonbankruptcy action has been filed in the appropriate nonbankruptcy forum, Los Angeles Superior Court, Roy Castellanos v. Scoobeez, et al. Case No. BC701427.
5. On or about July 1, 2019, Counsel for Debtor confirmed in an email that Debtor has in place an Employment Practice Liability Insurance ("EPLI") policy.
6. As of the filing of this motion, Debtor has not made its policy number or other policy identifying information known to Mr. Castellanos.
7. Mr. Castellanos is informed and believes that Debtor's EPLI policy is applicable and covers Mr. Castellanos' potential wrongful termination claims against Debtor.
8. Mr. Castellanos seeks recovery for his potential wrongful termination claims only from Debtor's applicable EPLI policy.
9. Based on the above, Mr. Castellanos seeks relief from the Automatic Stay currently in place for In re: SCOOBEEZ, INC., et al.; Bankruptcy Petition # 2:19-bk-14989-WB.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed July 3, 2019, at Los Angeles, California.



Sara Y. Showkatian, Esq.

IN RE: SCOOBEEZ, et al.
Case No.: 2:19-bk-14989

Service List

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